

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PACIFIC LANDSCAPE MANAGEMENT,
INC., a Washington corporation,

Plaintiff,

vs.

PACIFIC LANDSCAPE MANAGEMENT,
LLC, an Oregon limited liability company,

Defendant.

NO. 2:23-cv-01005-JHC

STIPULATED MOTION TO EXTEND
DATES AND SCHEDULING ORDER

NOTED ON MOTION CALENDAR FOR
AUGUST 15, 2024

I. STIPULATED MOTION

Plaintiff Pacific Landscape Management, Inc. (*Plaintiff*) and Defendant Pacific Landscape Management, LLC (*Defendant*) (collectively, the *Parties*), by and through their undersigned counsel, stipulate and agree to a modification of the existing case schedule as follows:

For reasons not pertinent to this motion, Defendant has transitioned between multiple firms in this case. Despite both Parties' diligence in pursuing discovery, Defendant's new counsel has experienced unexpected delays producing requested discovery and pursuing Defendant's counterclaim. In particular, Defendant's financial records necessary to evaluate damages were delayed. After reviewing

1 materials exchanged, the Parties now require some additional time to exchange
2 discovery materials so experts may finalize their review of those materials.

3 In addition, Defendant's new counsel has uncovered and is exploring a
4 previously unrealized statute of limitations issue that may require guidance from the
5 Court regarding how to proceed on the affected claims.

6 The Parties have stipulated and agreed to an extension of four weeks to the
7 currently scheduled deadlines reflected in the Minute Order Setting Trial Date and
8 Related Dates entered on July 1, 2024 (Dkt. No. 29). Specifically, the Parties have
9 stipulated to extending deadlines prior to the settlement conference.

10 The Parties have conferred and agreed upon the following new proposed case
11 schedule to allow for the diligent pursuit of all claims and defenses in this case. The
12 Parties propose that the Court extend the current deadlines as set forth in the
13 following table which shows the current deadline and the proposed new deadline:

Event	Current	Proposed
Deadline for amended pleadings	August 19, 2024	September 16, 2024
Disclosure of expert testimony under FRCP 26(a)(2)	August 19, 2024	September 16, 2024
All motions related to discovery must be filed by	September 18, 2024	October 16, 2024
Discovery completed by	October 18, 2024	November 15, 2024
All dispositive motions and motions challenging expert witness testimony must be filed by	November 18, 2024	December 16, 2024

22 The Parties agree and propose to maintain all subsequent current deadlines as
23 reflected in Dkt. No. 29.

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1 STIPULATED AND AGREED this 15th day of August 2024.

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II. ORDER

IT IS HEREBY ORDERED that the case schedule will be set as follows:

Event	Deadline
Deadline for amended pleadings	September 16, 2024
Disclosure of expert testimony under FRCP 26(a)(2)	September 16, 2024
All motions related to discovery must be filed by	October 16, 2024
Discovery completed by	November 15, 2024
All dispositive motions and motions challenging expert witness testimony must be filed by	December 16, 2024

All subsequent deadlines reflected in the Minute Order Setting Trial Date and Related Dates entered on July 1, 2024 (Dkt. # 29) remain.

IT IS SO ORDERED:

DATED this 15th day of August, 2024.



John H. Chun
United States District Judge